

REMARKS

Reconsideration and allowance are respectfully requested in view of the foregoing amendments and the following remarks. Claims 1-5, 8, and 12 have been amended. Claims 1, 8, and 12 are independent. Upon entry of this Amendment, claims 1-14 will remain pending.

I. Claim Rejections – 35 U.S.C. § 102

Claims 1-2 and 5-13 were rejected under 35 U.S.C. § 102(e) as being anticipated by Martin et al. (U.S. Patent No. 5,909,485; “Martin”). The Applicants respectfully traverse the rejection because Martin fails to teach or suggest all the features of the rejected claims.

Independent claim 1 recites a method for updating a subscriber’s account credit, comprising, *inter alia*:

maintaining information indicating the type of a last used voucher;

....

selecting the way of updating the credit on the basis of the type of the last used voucher and on the basis of the type of the second voucher.

Martin does not teach or suggest at least the above features. In fact, Martin is devoid of any teaching or suggestion that (1) information on the type of the last used payment option (voucher type according to the Office Action) is maintained, or that (2) the manner of updating credit is selected on the basis of the type of the last used payment option (voucher type according to the Office Action) and the type of the payment option (voucher type according to the Office Action) selected for depositing.

To the contrary, in the method of Martin, the last used payment option is not considered, and does not affect selection of the manner of updating credit. Applicants also respectfully point out that the cumulative checks of Martin, which are affected in part by whether payment by electronic funds transfer has been selected previously (col. 8, line 57 to col. 9, line 7), do not consider the last used payment option.

More fundamentally, Applicants respectfully submit that the “payment option” of Martin does not correspond to the “voucher...for making deposits” recited by Applicants’ claims. Martin discloses different payment options (e.g., electronic funds transfer EFT, bank card CB). For only the EFT option, the client must supply a bank identity voucher BIV (col. 4, lines 60-65). In other words, Martin discloses different payment options, but only one

voucher type, and clearly distinguishes between a voucher and a payment option. The Office Action, however, has improperly equated these concepts. Under the close scrutiny applied above, it is clear that Martin merely discloses one type of bank identity voucher and different types of payment options. Therefore, Martin does not teach or suggest “at least two different types of vouchers,” as required by independent claim 1.

For at least the above reasons, Applicants respectfully submit that claim 1 is not anticipated by Martin, and that the rejection should be withdrawn. Claims 2 and 5-7, which depend from claim 1, are patentable for the above reasons and for the additional features recited therein.

Independent claim 8 recites:

8. An arrangement for updating a subscriber's account credit in a telecommunications system where the subscriber can pre-pay for the subscriber's calls by making deposits in the subscriber's account using *at least two different types of vouchers* and where the system applies a first method to update the credit, the arrangement being arranged to

detect a possible change of voucher type when the credit is updated; and,

in response to said detection, to apply a second method to update the credit.

Martin does not teach at least the above italicized features. In contrast to the claimed invention, Martin merely teaches that a user selects a payment option (voucher type according to the Office Action), and the system either accepts or rejects that selection. If the system rejects a first payment option, the system simply checks whether or not a second payment option is acceptable. (Col. 7, lines 28-31.) Unlike the claimed invention, Martin contains no teaching or suggestion whatsoever to detect a possible change of voucher type when the credit is updated and to then apply a second method to update the credit. Moreover, as noted above, Martin only discloses one type of identity voucher. Thus, Martin does not disclose “at least two different types of vouchers” or “a change of voucher type.”

For at least the above reasons, claim 8 is not anticipated by Martin, and the rejection should be withdrawn. Claims 9-11, which depend from claim 8, are patentable for the above reasons and for the additional features recited therein.

Independent claim 12 recites similar features to those recited by claim 1. Claim 12 is patentable for at least the reasons discussed above and for the additional features recited therein.

II. Claim Rejections – 35 U.S.C. § 103

Claims 3-4 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Martin. Applicants respectfully traverse the rejection because Martin, even if properly modified, fails to teach or suggest all the features of the rejected claims. Claims 3-4 and 14 respectively depend from claims 1 and 12. For at least the above reasons and for the additional features recited therein, claims 3-4 and 14 are patentable over Martin, and Applicants respectfully request that the rejection be withdrawn.

III. Conclusion

All rejections having been addressed, Applicants request issuance of a notice of allowance indicating the allowability of claims 1-14. If anything further is necessary to place the application in condition for allowance, Applicants request that the Examiner contact Applicants' undersigned representative at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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